



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

March 3, 2024

By ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Robert Menendez, et. al,*
 S2 23 Cr. 490 (SHS)**

Dear Judge Stein:

The Government respectfully submits the enclosed proposed revised protective order for the Court's consideration, which concerns the Government's anticipated production of certain classified information to the defendants pursuant to Section 3 of the Classified Information Procedures Act ("CIPA"). The proposed order has been revised to reflect the names of additional cleared defense counsel, as confirmed by the Classified Information Security Officer since the order was originally submitted to the Court, and that the protective order is now on consent. The enclosed protective order is otherwise identical to the proposed protective order circulated to the defendants on February 9, 2024, and previously submitted to the Court on February 26, 2024.

Honorable Sidney H. Stein

March 3, 2024

Page 2

Respectfully submitted,

DAMIAN WILLIAMS

United States Attorney

By: s/ Eli J. Mark
Eli J. Mark
Daniel C. Richenthal
Paul M. Monteleoni
Lara Pomerantz
Assistant United States Attorneys
(212) 637-2431/2109/2219/2343

MATTHEW G. OLSON
Assistant Attorney General
National Security Division

By: s/ Christina A. Clark
Christina A. Clark
Trial Attorney
(202) 307-5191

Enclosure

cc: (by ECF)

Counsel of Record